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1 Michael T. Hornak (State Bar No. 81936)
email: mhornak@rutan.com
2 Ronald P. Oines (State Bar No. 145016)
email: roines@rutan.com
3 Bradley A. Chapin (State Bar No. 232885)
email: bchapin@rutan.com
4 Timothy Spivey (State Bar No. 269084)
RUTAN & TUCKER, LLP
5 611 Anton Boulevard, Fourteenth Floor
Costa Mesa, California 92626-1931
6 Telephone: 714-641-5100
Facsimile: 714-546-9035

7 Attorneys for Plaintiffs HID GLOBAL
8 CORPORATION, ASSA ABLOY AB and
DESTRON FEARING CORPORATION
9

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12

13 HID GLOBAL CORPORATION, a
Delaware corporation; ASSA ABLOY
14 AB, a Swedish Limited Liability
Company; and DESTRON FEARING
15 CORPORATION, a Delaware
corporation,

16 Plaintiffs,

17 vs.

18 SOUND CRAFT, INC., a California
19 corporation; and DOES 1 through 10,
inclusive,

20 Defendants.
21

Case No. **SACV13-01890 AG (ANx)**

**COMPLAINT FOR INJUNCTION
AND DAMAGES FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

2013 DEC -4 AM 11:09
CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
SANTA ANA

FILED

COMPLAINT FOR PATENT
INFRINGEMENT

1 Plaintiffs HID GLOBAL CORPORATION (“HID”), ASSA ABLOY AB
2 (“AAAB”) and DESTRON FEARING CORPORATION (“Destron”) (collectively,
3 “Plaintiffs”), for their Complaint against defendants SOUNDCRAFT, INC.
4 (“Soundcraft”), and DOES 1 through 10, inclusive (collectively, “Defendants”),
5 allege as follows:

6 JURISDICTION AND VENUE

7 1. This is an action involving claims of patent infringement under Title
8 35, United States Code. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331
9 and 1338(a).

10 2. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1400(b)
11 and § 1391(c), as Defendants reside in this judicial district, have committed acts of
12 infringement in this judicial district, and have a regular and established place of
13 business in this judicial district.

14 THE PARTIES

15 3. HID is a Delaware corporation having its principal place of business
16 located at 15370 Barranca Parkway, Irvine, California.

17 4. AAAB is a Limited Liability Company established under the laws of
18 Sweden and having a principal place of business in Stockholm, Sweden. AAAB is
19 HID’s parent company.

20 5. Destron is a Delaware corporation having its principal place of business
21 located in St. Paul, Minnesota.

22 6. Plaintiffs are informed and believe, and thereon allege, that Soundcraft
23 is a California corporation having its principal place of business located at 20301
24 Nordhoff Street, Chatsworth, California 91311. On information and belief,
25 Soundcraft sells and offers to sell the products that are the subject of this action
26 through its Secura Key division.

27 7. The true names and capacities, whether individual, corporate, associate
28 or otherwise, of defendants DOES 1 through 10, inclusive, are unknown to

1 Plaintiffs, which therefore sue said defendants by such fictitious names. Plaintiffs
2 will seek leave of this Court to amend this Complaint to include their proper names
3 and capacities when they have been ascertained. Plaintiffs are informed and believe,
4 and based thereon allege, that each of the fictitiously named defendants participated
5 in and is in some manner responsible for the acts described in this Complaint and
6 the damage resulting therefrom.

7 8. Plaintiffs allege on information and belief that each of the defendants
8 named herein as Does 1 through 10, inclusive, performed, participated in, or abetted
9 in some manner, the acts alleged herein, proximately caused the damages alleged
10 hereinbelow, and are liable to Plaintiffs for the damages and relief sought herein.

11 9. Plaintiffs allege on information and belief that, in performing the acts
12 and omissions alleged herein, and at all times relevant hereto, each of the
13 Defendants was the agent and employee of each of the other Defendants and was at
14 all times acting within the course and scope of such agency and employment with
15 the knowledge and approval of each of the other Defendants.

16 HID'S BUSINESS

17 10. HID is a leader in the delivery of secure identity solutions for millions
18 of customers throughout the world. HID's identity solutions are used in a variety of
19 applications, including physical access control, logical access control, access card
20 printing and personalization, highly secure government identification and animal
21 identification. HID's products, solutions and services are sold through a well-
22 established network of OEMs, developers, systems integrators and distributors
23 worldwide. End users of HID's products, solutions and services include businesses
24 and organizations in virtually all industry sectors, including government, healthcare,
25 retail, industrial, commercial, airports, ports, finance and education.

26 11. HID's physical access control products and solutions are sold under
27 HID's well-known brands, including iCLASS®, SmartID®, HID® Prox and
28 Indala® Prox. These industry leading products, include radio frequency

1 identification (“RFID”) readers and credentials that operate at low frequency
2 (i.e., 125 kHz), high frequency (i.e., 13.56 MHz), or both.

3 THE PATENT AT ISSUE

4 12. HID owns or is a licensee to numerous patents and other intellectual
5 property that relate to various aspects of HID’s business. The patent that is the
6 subject of this action, United States patent no. 5,952,935 (the “‘935 Patent”), relates
7 generally to multi-technology readers and credentials.

8 13. The ‘935 Patent, entitled “Reprogrammable Channel Search Reader,”
9 issued on September 14, 1999. Destron owns the ‘935 Patent. Pursuant to a license
10 agreement dated September 21, 2007 (the “License Agreement”), Destron’s
11 predecessor granted to Assa Abloy Identification Technology Group AB
12 (“AAITG”) an exclusive license in certain fields to the ‘935 Patent. Destron’s
13 predecessor further granted to AAITG the right to enforce the ‘935 Patent to the full
14 extent of the license granted, including the right to file actions for patent
15 infringement for any current or past infringement. By assignment, AAAB owns the
16 rights granted to AAITG pursuant to the license from Destron’s predecessor. HID
17 has a sublicense to the ‘935 Patent. Pursuant to the License Agreement, Destron’s
18 predecessor, as owner of the ‘935 Patent, agreed to participate in any infringement
19 action brought by AAITG, or its successor to the rights under the License
20 Agreement, AAAB. Destron is named as a plaintiff in this action for that reason
21 alone.

22 14. The ‘935 Patent generally discloses an RFID reader that is capable of
23 reading identification signals from transponders that use different frequencies,
24 different methods of modulation, and/or different methods of encoding to
25 communicate with the RFID reader. Another key aspect of the ‘935 Patent provides
26 that the RFID reader is programmable.

27 SOUNDCRAFT’S INFRINGEMENT

28 15. Soundcraft also is in the business of providing physical access control

1 solutions, including RFID readers that operate at 125 kHz carrier frequency.
2 Soundcraft competes directly with HID, and sells and seeks to sell its RFID readers
3 to various industry sectors, including those to which HID sells its products. As set
4 forth below, certain of Soundcraft's readers incorporate inventions that are disclosed
5 in and protected by the '935 patent.

6 CLAIM FOR RELIEF

7 (Patent Infringement – '935 Patent)

8 16. Plaintiffs reallege each and every allegation set forth in paragraphs 1
9 through 15, inclusive, and incorporate them herein by this reference.

10 17. Defendants make, use, sell, offer for sale, and/or import into the United
11 States products that meet each and every element of one or more claims of the '935
12 patent. As such, Defendants have infringed and are infringing the '935 patent.

13 18. Plaintiffs have marked relevant products and/or product literature with
14 the '935 Patent pursuant to 35 U.S.C. § 287. On information and belief, Defendants
15 have had actual knowledge of the '935 Patent before and during their infringement
16 of the '935 Patent. On information and belief, Defendants' infringement of the
17 '935 patent has been and will continue to be willful, wanton and deliberate with full
18 knowledge and awareness of Plaintiffs' patent rights.

19 19. Plaintiffs have been damaged in an amount to be determined at trial,
20 but which is no less than a reasonable royalty, and irreparably injured by
21 Defendants' infringing activities. Plaintiffs will continue to be so damaged and
22 irreparably injured unless such infringing activities are enjoined by this Court.

23 20. Moreover, in light of the willful nature of Defendants' conduct, this
24 case should be deemed "exceptional" under the Patent Laws. As a result, in addition
25 to damages, Plaintiffs are entitled to enhanced damages and their attorneys' fees and
26 costs incurred herein.

27 PRAYER FOR RELIEF

28 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

COMPLAINT FOR PATENT
INFRINGEMENT

1 1. That Defendants, their officers, directors, agents, servants, employees,
2 and all persons and entities in active concert or participation with them, or any of
3 them, be preliminarily and permanently enjoined and restrained from further
4 infringement of the '935 Patent;

5 2. A judgment by the Court that Defendants have infringed and are
6 infringing the '935 Patent;

7 3. An award of damages for infringement of the '935 Patent, together with
8 prejudgment interest and costs, said damages to be trebled by reason of the
9 intentional and willful nature of Defendants' infringement, as provided by 35 U.S.C.
10 § 284;

11 4. A determination that this case is "exceptional" under 35 U.S.C. § 285,
12 and an award of Plaintiffs' reasonable attorneys' fees;

13 5. That any monetary award include pre- and post-judgment interest at the
14 highest rate allowed by law;

15 6. For costs of suit; and

16 7. For such other and further relief as the Court may deem just and proper.

17 Dated: December 4, 2013

RUTAN & TUCKER, LLP
MICHAEL T. HORNAK
RONALD P. OINES
BRADLEY A. CHAPIN
TIMOTHY SPIVEY

18
19
20 By: 

Ronald P. Oines
Attorneys for Plaintiffs HID GLOBAL
CORPORATION, ASSA ABLOY
AB, and DESTRON FEARING
CORPORATION

DEMAND FOR JURY TRIAL

Pursuant to Local Rule 38-1 of the Local Rules of the United States District Court for the Central District of California, Plaintiffs hereby demand a jury trial in this action.

Dated: December 4, 2013

RUTAN & TUCKER, LLP
MICHAEL T. HORNAK
RONALD P. OINES
BRADLEY A. CHAPIN
TIMOTHY SPIVEY

By: _____


Ronald P. Oines
Attorneys for Plaintiffs HID GLOBAL
CORPORATION, ASSA ABLOY AB
and DESTRON FEARING
CORPORATION

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge Andrew J. Guilford and the assigned Magistrate Judge is Arthur Nakazato.

The case number on all documents filed with the Court should read as follows:

SACV13-01890 AG (ANx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge.

Clerk, U. S. District Court

December 4, 2013

Date

By M. Barr
Deputy Clerk

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☐

Western Division
312 N. Spring Street, G-8
Los Angeles, CA 90012

☒

Southern Division
411 West Fourth St., Ste 1053
Santa Ana, CA 92701

☐

Eastern Division
3470 Twelfth Street, Room 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

CIVIL COVER SHEET

I. (a) PLAINTIFFS (Check box if you are representing yourself ☐)

HID GLOBAL CORPORATION, a Delaware corporation; ASSA ABLOY AB, a Swedish Limited Liability Company; and DESTRON FEARING CORPORATION, a Delaware corporation,

(b) County of Residence of First Listed Plaintiff Orange

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

Michael T. Hornak SBN 81936 / Ronald P. Oines SBN 145016

Bradley A. Chapin SBN 232885 / Timothy Spivey SBN 269084

Rutan & Tucker, LLP

611 Anton Boulevard, Fourteenth Floor

Costa Mesa, CA 92626

Telephone: 714-641-5100

DEFENDANTS (Check box if you are representing yourself ☐)

SOUNDCRAFT, INC., a California corporation; and DOES 1 through 10, inclusive,

County of Residence of First Listed Defendant _____

(IN U.S. PLAINTIFF CASES ONLY)

Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

II. BASIS OF JURISDICTION (Place an X in one box only.)

☐ 1. U.S. Government Plaintiff☒ 3. Federal Question (U.S. Government Not a Party)☐ 2. U.S. Government Defendant☐ 4. Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. ORIGIN (Place an X in one box only.)

☒ 1. Original Proceeding ☐ 2. Removed from State Court ☐ 3. Remanded from Appellate Court ☐ 4. Reinstated or Reopened ☐ 5. Transferred from Another District (Specify) ☐ 6. Multi-District LitigationV. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)CLASS ACTION under F.R.Cv.P. 23: ☐ Yes ☒ No☒ MONEY DEMANDED IN COMPLAINT: \$ According to proof.

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

This is an action involving claims of patent infringement under Title 35, United States Code.

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	Habeas Corpus:	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 463 Alien Detainee	<input checked="" type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	TORTS	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	TORTS	PERSONAL PROPERTY	<input type="checkbox"/> 530 General	SOCIAL SECURITY
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	PERSONAL INJURY	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 371 Truth in Lending	Other:	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 330 Fed. Employers' Liability	BANKRUPTCY	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	FEDERAL TAX SUITS
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	FORFEITURE/PENALTY	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 350 Motor Vehicle	CIVIL RIGHTS	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	REAL PROPERTY	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 690 Other	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 441 Voting	LABOR	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 950 Constitutionality of State Statutes		<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 740 Railway Labor Act	
		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 751 Family and Medical Leave Act	
		<input type="checkbox"/> 369 Personal Injury Product Liability	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 790 Other Labor Litigation	
				<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	

FOR OFFICE USE ONLY:

Case Number:

SACV13-01890 AG (ANX)

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	STATE CASE WAS PENDING IN THE COUNTY OF:		INITIAL DIVISION IN CACD IS:
	<input type="checkbox"/> Los Angeles		Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo		Western
	<input type="checkbox"/> Orange		Southern
	<input type="checkbox"/> Riverside or San Bernardino		Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	If the United States, or one of its agencies or employees, is a party, is it:		INITIAL DIVISION IN CACD IS:
	A PLAINTIFF? Then check the box below for the county in which the majority of DEFENDANTS reside.	A DEFENDANT? Then check the box below for the county in which the majority of PLAINTIFFS reside.	
	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern
	<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western

Question C: Location of plaintiffs, defendants, and claims? (Make only one selection per row)	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

C.1. Is either of the following true? If so, check the one that applies:

- ☒ 2 or more answers in Column C
☐ only 1 answer in Column C and no answers in Column D

Your case will initially be assigned to the
SOUTHERN DIVISION.
Enter "Southern" in response to Question D, below.
If none applies, answer question C2 to the right. →

C.2. Is either of the following true? If so, check the one that applies:

- ☐ 2 or more answers in Column D
☐ only 1 answer in Column D and no answers in Column C

Your case will initially be assigned to the
EASTERN DIVISION.
Enter "Eastern" in response to Question D, below.
If none applies, go to the box below. ↓

Your case will initially be assigned to the
WESTERN DIVISION.
Enter "Western" in response to Question D below.

Question D: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, or C above: →	SOUTHERN

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEETIX(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ NO ☐ YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☐ NO ☒ YES

SACV10-1954 JVS (RNBx); SACV13-01272 JVS (RNBx); SACV13-01301 JVS (RNBx); and

If yes, list case number(s): SACV13-01302 JVS (RNBx)

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☒ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☒ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☒ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

X. SIGNATURE OF ATTORNEY
(OR SELF-REPRESENTED LITIGANT):

Ronald P. Oines

DATE: December 4, 2013

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))